Members of the Arkansas State Plant Board.

I am a cotton, peanut, and soybean farmer in Lee County, Arkansas who plants both Enlist and Extend traited cotton and soybeans, the majority of my farm is planted to Enlist cotton. I respect the position you find yourselves in dealing with the dicamba issue in Arkansas and I feel each of you have tried to make the right decisions for our environment and for the ability of each farmer and property owner to grow the crops he chooses.

I was surprised at the ease in which the federal registration was granted and extended for several dicamba products recently. There are some restrictions embedded in the new label I am afraid will be ignored by many producers who may or may not have been using it illegally in the past.

My thoughts are that dicamba isn't safe and effective enough option for the off-target risks associated with using it. Allowing a longer window of use, especially allowed for cotton spraying in the federal label, is going to negatively affect many crop yields except on dicamba tolerant crops. Many growers will take the recent vote as an excuse to make illegal applications under a false presumption that it is allowed.

I believe the Plant Board should reconvene and reconsider their recent recommendation to change the state's May 25th cutoff and follow the federal label. The law can't be changed in time for this year's crop use and dicamba is not our last line of defense against the Palmer pigweed anyway. We do still have options with other herbicide technologies such as the Enlist system that many want to ignore or think of it as part of the traditional auxin herbicide group that has been a problem for cotton growers in the past.

In closing I want to emphasize that the use of Enlist on Enlist traited crops provides less potential for off-target movement and I feel gives growers an avenue to battle weed pressure and survive without jeopardizing rights of others.

Sincerely,

Ramey Stiles

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Pesticide Division

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